

FILED  
CLERKS OFFICE  
2003 DEC 15 P 1:59  
UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

U.S. DISTRICT COURT  
DISTRICT OF MASS.

|                           |   |                         |
|---------------------------|---|-------------------------|
| TOWN OF DUXBURY, et al.,  | ] |                         |
| Plaintiffs                | ] |                         |
|                           | ] | CIVIL ACTION            |
| v.                        | ] | NO. <u>03-12399-RGS</u> |
|                           | ] |                         |
| AMERADA HESS CORPORATION, | ] | BBO #546461 (Longman)   |
| et al.,                   | ] | BBO #631965 (Wailgum)   |
| Defendants                | ] | BBO #640270 (Wilson)    |

**CORPORATE DISCLOSURE STATEMENT FOR DEFENDANTS  
ATLANTIC RICHFIELD COMPANY, BP AMERICA INC.,  
BP AMOCO CHEMICAL COMPANY,  
BP COMPANY NORTH AMERICA INC., BP CORPORATION  
NORTH AMERICA INC., BP GLOBAL SPECIAL PRODUCTS  
(AMERICA) INC., AND BP PRODUCTS NORTH AMERICA INC.  
(FORMERLY KNOWN AS AMOCO OIL COMPANY,  
AND MISNAMED AS BP PRODUCTS NORTH AMERICAS, INC.)**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and  
Local Rule 7.3, defendants Atlantic Richfield Company, BP America Inc., BP  
Amoco Chemical Company, BP Company North America Inc., BP Corporation  
North America Inc., BP Global Special Products (America) Inc., and BP Products  
North America Inc. (formerly known as Amoco Oil Company, and misnamed as  
BP Product North Americas, Inc.) submit the following Corporate Disclosure  
Statement:<sup>1</sup>

---

<sup>1</sup> To the extent the Complaint erroneously names BP entities that do not exist or no longer exist, a corporate disclosure statement cannot be filed for such fictitious or non-existent entities.

1. Atlantic Richfield Company's parent corporation is BP America Inc. BP America Inc.'s parent corporation is BP p.l.c., which is a publicly traded corporation organized under the laws of England and Wales. BP p.l.c. does not have a parent corporation and no publicly held corporation owns ten percent or more of its stock.

2. BP America Inc.'s parent corporation is BP p.l.c. BP p.l.c. does not have a parent corporation and no publicly held corporation owns ten percent or more of its stock.

3. BP Amoco Chemical Company's parent corporation is BP Company North America Inc. BP Company North America Inc.'s parent corporation is BP Corporation North America Inc. BP Corporation North America Inc.'s parent corporation is BP America Inc. BP America Inc.'s parent corporation is BP p.l.c. BP p.l.c. does not have a parent corporation and no publicly held corporation owns ten percent or more of its stock.

4. BP Company North America Inc.'s parent corporation is BP Corporation North America Inc. BP Corporation North America Inc.'s parent corporation is BP America Inc. BP America Inc.'s parent corporation is BP p.l.c. BP p.l.c. does not have a parent corporation and no publicly held corporation owns ten percent or more of its stock.

5. BP Corporation North America Inc.'s parent corporation is BP America Inc. BP America Inc.'s parent corporation is BP p.l.c. BP p.l.c. does not

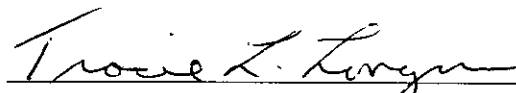
have a parent corporation and no publicly held corporation owns ten percent or more of its stock.

6. BP Global Special Products (America) Inc.'s parent corporation is Burmah Castrol Holdings Inc. Burmah Castrol Holdings Inc.'s parent corporation is Castrol North America Inc. Castrol North America Inc.'s parent corporation is BP America Inc. BP America Inc.'s parent corporation is BP p.l.c. BP p.l.c. does not have a parent corporation and no publicly held corporation owns ten percent or more of its stock.

7. BP Products North America Inc.'s parent corporation is BP Company North America Inc. BP Company North America Inc.'s parent corporation is BP Corporation North America Inc. BP Corporation North America Inc.'s parent corporation is BP America Inc. BP America Inc.'s parent corporation is BP p.l.c. BP p.l.c. does not have a parent corporation and no publicly held corporation owns ten percent or more of its stock.

DEFENDANTS ATLANTIC RICHFIELD  
COMPANY, BP AMERICA INC., BP  
AMOCO CHEMICAL COMPANY, BP  
COMPANY NORTH AMERICA INC., BP  
CORPORATION NORTH AMERICA INC.,  
BP GLOBAL SPECIAL PRODUCTS  
(AMERICA) INC., AND BP PRODUCTS  
NORTH AMERICA INC.

By their attorneys,



Tracie L. Longman (BBO #546461)  
Andrew G. Wailgum (BBO #631965)  
Seth M. Wilson (BBO #640270)  
Murtha Cullina LLP  
99 High Street, 20<sup>th</sup> Floor  
Boston, MA 02110-2320  
Telephone: (617) 457-4000  
Facsimile: (617) 482-3868

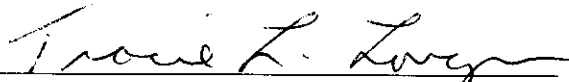
OF COUNSEL:

J. Andrew Langan  
Mark S. Lillie  
R. Chris Heck  
Kirkland & Ellis LLP  
200 East Randolph Drive  
Chicago, Illinois 60601-6636  
Telephone: (312) 861-2000  
Facsimile: (312) 861-2200

Peter Bellacosa  
Kirkland & Ellis LLP  
Citigroup Center  
153 East 53rd Street  
New York, New York 10022-4675  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900

**CERTIFICATE OF SERVICE**

I, Tracie L. Longman, one of the attorneys for Atlantic Richfield Company, BP America Inc., BP Amoco Chemical Company, BP Company North America Inc., BP Corporation North America Inc., BP Global Special Products (America) Inc. and BP Products North America Inc., hereby certify that I caused a copy of the foregoing to be served upon all counsel on the attached Service List, by U.S. Mail, first class postage prepaid, on December 12, 2003.

  
Tracie L. Longman (BBO #546461)

**SERVICE LIST**

**Attorneys for Plaintiffs:**

Richard M. Sandman  
Rodman, Rodman & Sandman, P.C.  
442 Main Street  
Suite 300  
Malden, MA 02148-5122

Scott Summy  
Baron & Budd, P.C.  
3102 Oak Lawn Avenue, Suite 1100  
Dallas, TX 75219-4281  
(214) 521-3605

Robert Gordon  
Weitz & Luxenberg, P.C.  
180 Maiden Lane, 17<sup>th</sup> Floor  
New York, NY 10038-4925

**Attorneys for Defendants:**

Mindy G. Davis  
Howrey Simon Arnold & White  
1299 Pennsylvania Avenue, NW  
Washington, DC 20006  
(202) 783-0800  
(202) 383-6610 (fax)  
*Attorneys for Amerada Hess  
Corporation, Coastal Eagle Point Oil  
Company, Coastal Mobile Refining  
Company, Coastal Oil New England,  
Inc., El Paso CGP Company, El Paso  
Corporation, El Paso Merchant Energy-  
Petroleum Company*

John Fanning  
Cullen and Dykman Bleakley Platt LLP  
177 Montague Street  
Brooklyn, NY 11201  
(718) 780-0085  
(718) 935-1509 (fax)  
*Attorney for Getty Petroleum  
Marketing, Inc.*

John McGahren  
Kristi Midboe Miller  
Latham & Watkins LLP  
One Newark Center, 16<sup>th</sup> Floor  
Newark, NJ 07101-3174  
(973) 639-7270  
(973) 639-7298 (fax)  
*Attorney for Getty Properties Corp.*

Alan J. Hoffman  
Blank Rome LLP  
One Logan Square  
18<sup>th</sup> & Cherry Streets  
Philadelphia, PA 19103-6998  
(215) 569-5505  
(215) 832-5505 (fax)  
*Attorneys for Lyondell Chemical Co.*

Brendan M. Dixon  
Deputy General Counsel  
Unocal Corporation  
376 S. Valencia Avenue  
Brea, CA 92823  
(714) 577-2933  
(714) 577-2980 (fax)  
*Attorney for Unocal Corporation*

Steven L. Leifer  
Baker Botts LLP  
1299 Pennsylvania Avenue, NW  
Washington, DC 20004-2400  
(202) 639-7723  
(202) 585-1040 (fax)  
*Attorney for Marathon Ashland  
Petroleum LLC; Marathon Oil  
Company; and Marathon Oil  
Corporation*

Paul J. Hogan  
Joseph W. Martini  
Amy McCallan  
Karen Mignone  
Pepe & Hazard LLP  
225 Franklin Street, 16th Floor  
Boston, MA 02110  
(617) 748-5500  
(617) 748-5555 (fax)

and

Dan H. Ball  
John W. Rogers  
Bryan Cave LLP  
One Metropolitan Square  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
(314) 259-2200 (Ball)  
(314) 259-2009 (Rogers)  
(314) 259-2020 (fax)  
*Attorneys for Premcor, Inc. and The  
Premcor Refining Group, Inc.*

Mark E. Tully  
Goodwin Procter LLP  
Exchange Place  
Boston, MA 02109  
(617) 570-1000  
(617) 523-1231 (fax)  
*Attorneys for Chelsea Sandwich LLC;  
Cumberland Farms Incorporated;  
Global Companies, LLC; Global  
Montello Group, LLC; Global  
Petroleum Corporation; and Gulf Oil  
Limited Partnership*

William L. Parker  
Fitzhugh, Parker & Alvaro LLP  
155 Federal Street  
Suite 1700  
Boston, MA 02110-1727  
(617) 695-2330  
(617) 695-2335 (fax)

and

Peter C. Condrón  
Richard E. Wallace, Jr.  
Wallace King Mararo & Branson  
1050 Thomas Jefferson St., NW  
Washington, DC 20007  
(202) 204-1000  
(202) 204-1001 (fax)  
*Attorneys for Chevron U.S.A., Inc.,  
individually and formerly known as  
Gulf Oil Corp. (d/b/a Chevron Products  
Company and d/b/a Chevron Chemical  
Company); Equilon Enterprises, LLC,  
individually and also known as Shell  
Oil Products US; Motiva Enterprises,  
LLC; Shell Oil Company; Shell Oil  
Products Company; Shell Oil Products  
Company, LLC; Shell Petroleum, Inc.;  
Shell Trading (US) Company,  
individually and formerly known as  
Equiva Trading Company, and also  
known as Stusco*



Andrew Lapayowker  
Vice President, General Counsel  
and Secretary  
Legal Department  
Crown Central Petroleum Corporation  
One North Charles Street (21201)  
Post Office Box 1168  
Baltimore, MD 21203  
(410) 659-4834  
(410) 659-4763 (fax)

and

Ben M. Krowicki  
Bingham McCutchen LLP  
One State Street  
Hartford, CT 06103  
(860) 240-2926  
(860) 240-2818 (fax)  
*Attorneys for Crown Central Petroleum  
Corporation*

Wayne F. Dennison  
Brown Rudnick Berlack Israels LLP  
One Financial Center  
Boston, MA 02111  
(617) 856-8247  
(617) 856-8201 (fax)

and

Joseph C. Kearfott  
Stuart A. Raphael  
Shawn A. Copeland  
Hunton & Williams LLP  
Riverfront Plaza, East Tower  
951 E. Byrd Street  
Richmond, VA 23219  
(804) 788-8200  
(804) 788-8218 (fax)  
*Attorneys for Koch Industries Inc.*

John S. Guttman  
Beveridge & Diamond, P.C.  
1350 I Street, NW  
Suite 700  
Washington, DC 20005  
(202) 789-6020  
(202) 789-6190 (fax)  
*Attorney for Sunoco Inc., Sunoco Inc.  
(R&M)*

Rod G. Smith  
ConocoPhillips  
600 North Dairy Ashford  
Houston, TX 77079  
(281) 293-1740  
(281) 293-3826 (fax)  
*Attorney for ConocoPhillips Company*

Peter J. Sacripanti  
James A. Pardo  
McDermott, Will & Emery  
50 Rockefeller Plaza  
New York, NY 10020-1605  
(212) 547-5400  
(212) 547-5444 (fax)

and

Deborah E. Barnard  
Robin L. Main  
Tara Myslinski  
Holland & Knight LLP  
10 St. James Ave.  
Boston, MA 02116  
(617) 523-2700  
(617) 523-6850 (fax)  
*Attorneys for Exxon Mobil Chemical  
Company, Inc.; Exxon Mobil  
Corporation; Exxon Mobil Oil  
Corporation; Exxon Mobil Refining and  
Supply Company; and Mobil  
Corporation*

Charles Siddons  
McMillan Constabile, LLP  
777 Summer Street  
Stamford, CT 06901

and

Randle B. Carpenter  
CARPENTERS  
River House - Suite 2  
29 Hazel Lane  
Larchmont, NY 10538  
(914) 834-6669  
(914) 834-3109 (fax)  
*Attorneys for Star Supply Petroleum  
Inc.*

Tracie J. Renfroe  
Bracewell & Patterson  
711 Louisiana Street  
Suite 2900  
Houston, TX 77002-2781  
(713) 221-1404  
(713) 221-2123 (fax)  
***Attorney for Valero Energy  
Corporation, Valero Marketing and  
Supply Company, Valero Refining and  
Marketing Company***

Nathan P. Eimer  
Pamela R. Hanebutt  
Lisa S. Meyer  
Eimer Stahl Klevorn & Solberg LLP  
224 S. Michigan Avenue  
Suite 1100  
Chicago, IL 60604  
(312) 660-7600  
(312) 692-1718 (fax)

and

J. Owen Todd  
Lisa G. Arrowood  
Kathleen M. Genova  
Todd & Weld LLP  
28 State Street  
Boston, MA 02109  
(617) 720-2626  
(617) 720-2626 (fax)  
***Attorneys for CITGO Petroleum  
Corporation and CITGO Refining and  
Chemical Inc.***